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*Attorneys for Defendants, Zieses Investment  
Partnership, Marshall Zieses, Debra S. Zieses, Neil R.  
Zieses, Caryn Zieses, Barry Inger, Allan Inger, and  
Susan B. Alswanger*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

ZIESES INVESTMENT PARTNERSHIP,  
MARSHALL ZIESES, DEBRA S. ZIESES, NEIL R.  
ZIESES, CARYN ZIESES, BARRY INGER, ALLAN  
INGER, and SUSAN B. ALSWANGER,

Defendants.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04669 (SMB)

**NOTICE OF REQUEST TO WITHDRAW AND SUBSTITUTE COUNSEL**

Anthony A. Mingione and Philippe Marc Salomon and the law firm Blank Rome LLP, having appeared as attorneys for Defendants Zieses Investment Partnership, Marshall Zieses, Debra S. Zieses, Neil R. Zieses, Caryn Zieses, Barry Inger, Allan Inger, and Susan B. Alswanger (“Defendants”) in the above-referenced matter and adversary proceeding, hereby request to withdraw as Attorneys of Record in connection with the above-referenced matter and in the related adversary proceeding, and to substitute Helen Davis Chaitman of Becker & Poliakoff, LLP, as counsel for Defendants in those matters.

As grounds for this Request to Withdraw as Attorneys of Record, Defendants have retained Helen Davis Chaitman of Becker & Poliakoff, LLP, 45 Broadway, 8<sup>th</sup> Floor, New York, New York 10006 to represent them in these proceedings.

Wherefore, Blank Rome LLP, by and through Philippe Marc Salomon and Anthony A. Mingione, and Becker & Poliakoff, LLP, by and through Helen Davis Chaitman of respectfully request that this Request to Withdraw and Substitute Counsel be granted. A proposed order is attached.

Dated: New York, New York  
December 15, 2014

**BLANK ROME LLP**

*Withdrawing Attorneys for Defendants  
Zieses Investment Partnership, Marshall  
Zieses, Debra S. Zieses, Neil R. Zieses,  
Caryn Zieses, Barry Inger, Allan Inger,  
and Susan B. Alswanger*

By: /s/ Anthony A. Mingione  
Philippe Marc Salomon  
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**BECKER & POLIAKOFF LLP**

*Substituting Attorneys for Defendants  
Zieses Investment Partnership, Marshall  
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INGER, and SUSAN B. ALSWANGER,

Defendants.

Adv. Pro. No. 10-04669 (SMB)

**ORDER GRANTING REQUEST TO WITHDRAW AND SUBSTITUTE COUNSEL**

Anthony A. Mingione and Philippe Marc Salomon of Blank Rome LLP have previously appeared and filed pleadings on behalf of Defendants Zieses Investment Partnership, Marshall Zieses, Debra S. Zieses, Neil R. Zieses, Caryn Zieses, Barry Inger, Allan Inger, and Susan B. Alswanger (“Defendants”), and Defendants having retained separate legal counsel, Helen Davis Chaitman of Becker & Poliakoff, LLP, 45 Broadway, 8<sup>th</sup> Floor, New York, New York 10006, to represent them in these proceedings, with Blank Rome LLP and Becker & Poliakoff, LLP having filed a Request to Withdraw and Substitute Counsel, it is hereby

ORDERED, that the Request of Philippe Marc Salomon, Anthony A. Mingione and Blank Rome LLP, to Withdraw as counsel and Attorneys of Record be and is hereby granted; it is further

ORDERED, that Helen Davis Chaitman of Becker & Poliakoff, LLP is hereby substituted as counsel and Attorney of Record for Defendants.

Dated: New York, New York  
December \_\_, 2014

/s/  
Honorable Stuart M. Bernstein  
United States Bankruptcy Judge